

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

NOTICE OF MOTION

Pursuant to Fed. R. Civ. P. 23, Plaintiffs Jessica Jones, Christina Lorenzen, and Amy Coulson hereby move the Court for an order:

1. Granting preliminary approval of the proposed Settlement between Plaintiffs and Defendants, and preliminarily finding pursuant to Fed. R. Civ. P. 23(c)(2) and 23(e) that the terms of the proposed Settlement, as encompassed by the Settlement Agreement filed herewith, are fair, reasonable, and adequate as to the absent members of the proposed State Law Damages Class and Injunctive Relief Class (“Settlement Classes”);

2. Finding that the Court will likely be able to certify the proposed Settlement Classes as defined in the Settlement Agreement pursuant to Fed. R. Civ. P. 23 (a) and (b);

3. Approving Plaintiffs as representatives of the Settlement Classes;

4. Approving (a) Joseph Saveri Law Firm, LLP, as Plaintiffs’ lead class counsel; (b) Paul LLP, Hartley LLP, and Gustafson Gluek PLLC as Plaintiffs’ executive committee counsel; and (c) Turner Feild, PLLC as Plaintiffs’ liaison counsel; finding that all will fairly and adequately protect the interests of the Settlement Classes; and collectively approving all of the above counsel as Settlement Class Counsel pursuant to Fed. R. Civ. P. 23(c)(1)(B) and (g);

5. Appointing Angeion Group LLC as Settlement Administrator;

6. Appointing Citibank N.A. as Escrow Agent;

7. Approving Plaintiffs’ proposed Notice Plan and authorizing dissemination of notice to the proposed Settlement Classes pursuant to Fed. R. Civ. P. 23(c)(2);

8. Setting a date for the Final Settlement Fairness Hearing and authorizing Plaintiffs’ proposed schedule for completing the approval process.

WHEREFORE, for the reasons set forth in the accompanying memorandum of law and exhibits, together with all documents entered in the Court’s docket and transcripts of proceedings in this matter, and any oral argument that shall be taken, Plaintiffs respectfully request that the Court grant this motion and enter the Proposed Order filed herewith. Defendants do not oppose this motion.

Dated: May 13, 2024

Respectfully submitted,

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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CERTIFICATE OF CONSULTATION

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that my firm consulted with Defendants' counsel via email regarding this motion. No party opposed the relief sought.

/s/ Joseph R. Saveri

Joseph R. Saveri